

Fill in this information to identify the case:

Debtor 1 Jose A. Zuniga

Debtor 2 \_\_\_\_\_  
(Spouse, if filing)

United States Bankruptcy Court for the: Southern District of Texas  
(State)

Case number 17-50002

Form 4100R

**Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

**Part 1: Mortgage Information**

Name of creditor: U.S. Bank National Association, not in its individual capacity but solely as trustee for RMTP Trust, Series 2021 BK0M-TT Court claim no. (if known): 1

Last 4 digits of any number you use to identify the debtor's account: 9 0 2 6

Property address: 4455 Vientos Rd.  
Number Street

Laredo, TX 78046  
City State ZIP Code

**Part 2: Prepetition Default Payments**

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

**Part 3: Postpetition Mortgage Payment**

Check one:

- ☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: MM / DD / YYYY

- ☒ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ 3831.48
- b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ \_\_\_\_\_
- c. **Total.** Add lines a and b. (c) \$ 3831.48

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

04 / 01 / 2022  
MM / DD / YYYY

Debtor 1 Jose A. Zuniga Case number (if known) 17-50002  
First Name Middle Name Last Name

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

Check the appropriate box::

- ☐ I am the creditor.  
☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

**X** /s/ Jennine Hovell-Cox  
Signature

Date 08 / 17 / 2022

Print Jennine Hovell-Cox  
First Name Middle Name Last Name

Title Authorized Agent for Secured Creditor

Company Ghidotti Berger, LLP

**If different from the notice address listed on the proof of claim to which this response applies:**

Address 9720 Coit Road, Suite 220-228  
Number Street

Plano, TX 75025  
City State ZIP Code

Contact phone (949) 427 - 2010

Email bknotifications@ghidottiberger.com



mfr 7/18/2019  
ao 8/16/2019  
total post arr \$ 3,439.26 3/19 - 6/19

PAYMENT CHANGES				
DATE	P&I	Escrow	TOTAL	Reference
02/01/17	397.35	360.85	758.20	ymment listed in POC
05/01/18	397.35	439.56	836.91	PC filed with the court
05/01/19	397.35	485.37	882.72	PC filed with the court
05/01/20	397.35	421.30	818.65	PC filed with the court
11/01/21	397.35	363.53	760.88	PC filed with the court
05/01/22	397.35	370.30	767.65	PC filed with the court
		0.00		
		0.00		
		0.00		
		0.00		

Loan#	
Borrower:	ZUNIGA
Date Filed:	1/2/2017
BK Case #	17-50002
Petition Due Date:	
Date:	2/1/2017
POC covers:	6/16 - 1/17
prepet claim total	\$ 8,031.99

Date	Amount Recvd	PRE/POST/APO	Post Petition Due Date	Contractual Due Date	Amount Due	Over/Shortage	Suspense Credit	Suspense Debit	Susp Balance	POC DATE PAID	POC Arrears Credit	POC Debit	POC Suspense Balance	POC Paid to Date
Beginning Suspense Balance						\$0.00			\$0.00				\$0.00	\$0.00
3/10/2017	\$ 758.20	Post	2/1/17	6/1/16	\$758.20	\$0.00			\$0.00				\$0.00	\$0.00
6/8/2017	\$ 758.20	Post	3/1/17	7/1/16	\$758.20	\$0.00			\$0.00				\$0.00	\$0.00
	\$ 758.20	Post	4/1/17	8/1/16	\$758.20	\$0.00			\$0.00				\$0.00	\$0.00
	\$ 758.20	Post	5/1/17	9/1/16	\$758.20	\$0.00			\$0.00				\$0.00	\$0.00
7/6/2017	\$ 758.20	Post	6/1/17	10/1/16	\$758.20	\$0.00			\$0.00				\$0.00	\$0.00
8/8/2017	\$ 758.20	Post	7/1/17	11/1/16	\$758.20	\$0.00			\$0.00				\$0.00	\$0.00
9/20/2017	\$ 758.20	Post	8/1/17	12/1/16	\$758.20	\$0.00			\$0.00				\$0.00	\$0.00
9/20/2017		Pre				\$0.00			\$0.00		\$420.37		\$420.37	\$420.37
10/5/2017	\$ 758.20	Post	9/1/17	1/1/17	\$758.20	\$0.00			\$0.00				\$420.37	\$420.37
10/5/2017		Pre				\$0.00			\$0.00		\$44.74		\$465.11	\$465.11
12/6/2017	\$ 758.20	Post	10/1/17	2/1/17	\$758.20	\$0.00			\$0.00				\$465.11	\$465.11
1/4/2018	\$ 758.20	Post	11/1/17	3/1/17	\$758.20	\$0.00			\$0.00				\$465.11	\$465.11
	\$ 758.20	Post	12/1/17	4/1/17	\$758.20	\$0.00			\$0.00				\$465.11	\$465.11
2/9/2018	\$ 758.20	Post	1/1/18	5/1/17	\$758.20	\$0.00			\$0.00				\$465.11	\$465.11
4/9/2018	\$ 758.20	Post	2/1/18	6/1/17	\$758.20	\$0.00			\$0.00				\$465.11	\$465.11
	\$ 758.20	Post	3/1/18	7/1/17	\$758.20	\$0.00			\$0.00				\$465.11	\$465.11
6/8/2018	\$ 758.20	Post	4/1/18	8/1/17	\$758.20	\$0.00			\$0.00				\$465.11	\$465.11
	\$ 836.91	Post	5/1/18	9/1/17	\$836.91	\$0.00			\$0.00				\$465.11	\$465.11
8/9/2018	\$ 836.91	Post	6/1/18	10/1/17	\$836.91	\$0.00			\$0.00				\$465.11	\$465.11
9/6/2018	\$ 836.91	Post	7/1/18	11/1/17	\$836.91	\$0.00			\$0.00				\$465.11	\$465.11
10/9/2018	\$ 836.91	Post	8/1/18	12/1/17	\$836.91	\$0.00			\$0.00				\$465.11	\$465.11
11/7/2018	\$ 836.91	Post	9/1/18	1/1/18	\$836.91	\$0.00			\$0.00				\$465.11	\$465.11
	\$ 836.91	Post	10/1/18	2/1/18	\$836.91	\$0.00			\$0.00				\$465.11	\$465.11
12/7/2018		pre				\$0.00			\$0.00		\$57.35		\$522.46	\$522.46
	\$ 836.91	Post	11/1/18	3/1/18	\$836.91	\$0.00			\$0.00				\$522.46	\$522.46
1/4/2019	\$836.91	Post	12/1/18	4/1/18	\$836.91	\$0.00			\$0.00		\$97.76		\$620.22	\$620.22
2/11/2019	\$836.91	Post	1/1/19	5/18 - 6/18	\$836.91	\$0.00			\$0.00		701.78	\$836.91	\$485.09	\$1,322.00
3/12/2019	\$836.91	Post	2/1/19	7/1/18		\$836.91			\$0.00		\$97.97		\$583.06	\$1,419.97
7/1/2019			MFR FILED			\$0.00			\$0.00				\$583.06	\$1,419.97
8/8/2019		pre		8/1/18		\$0.00			\$0.00		\$269.20	\$836.91	\$15.35	\$1,689.17
8/15/2019		APO	proposed SO to resolve 3/19 - 6/19			\$0.00			\$0.00				\$15.35	\$1,689.17
8/16/2019		APO	SO approved			\$0.00			\$0.00				\$15.35	\$1,689.17
9/5/2019		pre				\$0.00			\$0.00		\$227.38		\$242.73	\$1,916.55
12/4/2019		pre				\$0.00			\$0.00		\$282.95		\$525.68	\$2,442.50
	\$4,413.60	Post	7/1/19	9/1/18	\$882.72	\$3,530.88	\$3,530.88		\$3,530.88				\$525.68	\$2,968.18
		Post	8/1/19	10/1/18	\$882.72	-\$882.72		\$882.72	\$2,648.16	\$159.13			\$684.81	\$2,358.63
		Post	9/1/19	11/1/18	\$882.72	-\$882.72		\$882.72	\$1,765.44				\$684.81	\$2,358.63
		Post	10/1/19	12/1/18	\$882.72	-\$882.72		\$882.72	\$882.72				\$684.81	\$2,358.63
		Post	11/1/19	1/1/19	\$882.72	-\$882.72		\$882.72	\$0.00				\$684.81	\$2,358.63
1/8/2020	\$882.72	Post	12/1/19	2/1/19	\$882.72	\$0.00			\$0.00		\$160.06		\$844.87	\$2,518.69
		Post		3/1/19		\$0.00			\$0.00		\$90.02	\$836.91	\$97.98	\$2,608.71
2/20/2020	\$882.72	Post	1/1/20	4/1/19	\$882.72	\$0.00			\$0.00		\$522.58		\$620.56	\$3,131.29
		Post		5/1/19		\$0.00			\$0.00		\$293.90	\$882.72	\$31.74	\$3,425.19
3/11/2020	\$882.72	Post	2/1/20	6/1/19	\$882.72	\$0.00			\$0.00		\$816.83		\$848.57	\$4,242.02
				7/1/19		\$0.00			\$0.00		\$459.38	\$882.72	\$425.23	\$4,701.40
5/5/2020	\$882.72	Post	3/1/20	8/1/19	\$882.72	\$0.00			\$0.00				\$425.23	\$4,701.40
6/2/2020	\$882.72	Post	4/1/20	9/1/19	\$882.72	\$0.00			\$0.00				\$425.23	\$4,701.40
	\$818.65	post	5/1/20	10/19 - 11/19	\$818.65	\$0.00			\$0.00		\$709.78	\$882.72	\$252.29	\$5,411.18
8/5/2020	\$818.65	post	6/1/20	12/1/19	\$818.65	\$0.00			\$0.00		\$399.17		\$651.46	\$5,810.35
10/6/2020	\$818.65	post	7/1/20	1/1/20	\$818.65	\$0.00			\$0.00				\$651.46	\$5,810.35
11/6/2020	\$818.65	post	8/1/20	2/1/20	\$818.65	\$0.00			\$0.00				\$651.46	\$5,810.35
	\$818.65	post	9/1/20	3/1/20	\$818.65	\$0.00			\$0.00				\$651.46	\$5,810.35
12/10/2020	\$818.65	post	10/1/20	4/1/20	\$818.65	\$0.00			\$0.00				\$651.46	\$5,810.35
2/2/2021	\$1,637.30	post	11/1/20	5/1/20	\$818.65	\$818.65	\$818.65		\$818.65				\$651.46	\$5,810.35
		post	12/1/20	6/1/20	\$818.65	-\$818.65		\$818.65	\$0.00				\$651.46	\$5,810.35
3/16/2021	\$818.65	post	1/1/21	7/1/20	\$818.65	\$0.00			\$0.00				\$651.46	\$5,810.35
4/7/2021	\$1,637.30	post	2/1/21	8/20 - 10/20	\$818.65	\$818.65	\$818.65		\$818.65		\$1,576.08	\$1,637.30	\$590.24	\$7,386.43
		Post	3/1/21	11/20 - 12/20	\$818.65	-\$818.65		\$818.65	\$0.00		\$886.37	\$818.65	\$657.96	\$8,272.80
		Escrow				\$0.00			\$0.00			\$86.77	\$571.19	\$8,272.80
5/4/2021	\$818.65	post	4/1/21	1/1/21	\$818.65	\$0.00			\$0.00				\$571.19	\$8,272.80
		Pre				\$0.00			\$0.00		\$684.43		\$1,255.62	\$9,957.23
		Post				\$0.00			\$0.00		\$384.92		\$1,640.54	\$9,342.15
		Escrow				\$0.00			\$0.00			\$902.15	\$738.39	\$9,342.15
		Pre	reconcile suspense			\$0.00			\$0.00				\$1,460.00	\$9,342.15
5/14/2021		Pre		2/1/21		\$0.00			\$0.00			\$818.65	\$641.35	\$9,342.15
7/7/2021	\$818.65	Post	5/1/21	3/1/21	\$818.65	\$0.00			\$0.00				\$641.35	\$9,342.15
8/4/2021	\$818.65	Post	6/1/21	4/1/21	\$818.65	\$0.00			\$0.00				\$641.35	\$9,342.15
9/8/2021	\$1,637.30	Post	7/1/21	5/1/21	\$818.65	\$818.65	\$818.65		\$818.65				\$641.35	\$9,342.15
9/8/2021		Post	8/1/21	6/1/21	\$818.65	-\$818.65		\$818.65	\$0.00				\$641.35	\$9,342.15
9/8/2021		Pre				\$0.00			\$0.00		\$405.51		\$1,046.86	\$9,747.66
9/8/2021		Pre				\$0.00			\$0.00		\$228.05	\$1,115.95	\$158.96	\$9,975.71
10/6/2021	\$818.65	Post	9/1/21	7/1/21	\$818.65	\$0.00			\$0.00				\$158.96	\$9,975.71
10/6/2021		Pre				\$0.00			\$0.00		\$249.41		\$408.37	\$10,225.12
10/6/2021		Pre				\$0.00			\$0.00		\$140.26		\$548.63	\$10,365.38
11/4/2021	\$818.65	Post	10/1/21	8/1/21	\$818.65	\$0.00			\$0.00				\$548.63	\$10,365.38
11/4/2021		Pre				\$0.00			\$0.00		\$77.67		\$626.30	\$10,443.05
11/4/2021		Pre				\$0.00			\$0.00		\$43.68		\$669.98	\$10,486.73
12/9/2021	\$760.88	Post	11/1/21	9/1/21	\$760.88	\$0.00			\$0.00				\$669.98	\$10,486.73
12/9/2021		Pre				\$0.00			\$0.00		\$251.22		\$921.20	\$10,737.95
12/9/2021		Pre				\$0.00			\$0.00		\$141.28		\$1,062.48	\$10,879.23
1/10/2022	\$760.88	Post	12/1/21	10/1/21	\$760.88	\$0.00			\$0.00				\$1,062.48	\$10,879.23
1/10/2022		Pre				\$0.00			\$0.00		\$283.11		\$1,345.59	\$11,162.34
1/10/2022		Pre				\$0.00			\$0.00		\$159.21		\$1,504.80	\$11,321.55
2/8/2022	\$760.88	Post	1/1/22	11/1/21	\$760.88	\$0.00			\$0.00				\$1,504.80	\$11,321.55
2/8/2022		Pre		12/1/21		\$0.00			\$0.00		\$95.81	\$882.72	\$717.89	\$11,417.36
2/8/2022		pre		1/1/21		\$0.00			\$0.00		\$53.89	\$771.78	\$0.00	\$11,471.25
						\$0.00			\$0.00				\$0.00	\$11,471.25
						\$0.00			\$0.00				\$0.00	\$11,471.25
3/15/2022	\$1,000.00	Post	2/1/22	2/1/22	\$760.88	\$239.12	\$239.12		\$239.12				\$0.00	\$11,

Post Due			4/1/22		\$760.88	-\$760.88			\$0.00				\$0.00	\$11,471.25
			5/1/22		\$767.65	-\$767.65			\$0.00				\$0.00	\$11,471.25
			6/1/22		\$767.65	-\$767.65			\$0.00				\$0.00	\$11,471.25
			7/1/22		\$767.65	-\$767.65			\$0.00				\$0.00	\$11,471.25
			8/1/22		\$767.65	-\$767.65			\$0.00				\$0.00	\$11,471.25

**CERTIFICATE OF SERVICE**

On 8/17/2022, I served the foregoing documents described as Response to Notice of Final Cure Payment on the following individuals by electronic means through the Court's ECF program:

**COUNSEL FOR DEBTOR**

Carl Michael Barto  
Law Office of Carl M. Barto  
817 Guadalupe St.  
Laredo, TX 78040  
cmblaw@netscorp.net

**CHAPTER 13 Trustee**

William E. Heitkamp  
Office of Chapter 13 Trustee  
9821 Katy Freeway  
Ste 590  
Houston, TX 77024  
heitkamp@ch13hou.com

**US TRUSTEE**

Office of the US Trustee  
515 Rusk Ave  
Ste 3516  
Houston, TX 77002  
USTPRegion07.HU.ECF@USDOJ.GOV

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ Jennine Hovell-Cox  
Jennine Hovell-Cox

On 8/17/2022, I served the foregoing documents described as Response to Notice of Final Cure Payment on the following individuals by depositing true copies thereof in the United States mail at Santa Ana, California enclosed in a sealed envelope, with postage paid, addressed as follows:

**DEBTOR**

Jose A. Zuniga  
4455 Vientos Rd.  
Laredo, TX 78046

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ Jennine Hovell-Cox  
Jennine Hovell-Cox